

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WESTERN TOWBOAT COMPANY,

Plaintiff,

v.

VIGOR MARINE, LLC,

Defendant.

IN ADMIRALTY

Case No. 2:20-cv-00416-RSM

STIPULATED MOTION TO EXTEND
FED. R. CIV. P. 54 / LCR 54(d)(1)
DEADLINES

File Date: January 13, 2022

The parties, Vigor Marine, LLC (“Vigor”) and Western Towboat Company (“Western”), by and through their undersigned counsel of record, jointly move that this Court order that the deadlines of Fed. R. Civ. P. 54 / LCR 54(d)(1) for filing a bill of costs and any necessary affidavits or evidence substantiating the amount and reasonableness of recoverable attorney fees (if the Court determines either party is entitled to same) be extended to 21 days after either:

1. The passing of the last date to note any appeal pursuant to Federal Rule of Appellate Procedure 4 of this Court’s January 7, 2022 Final Judgment [ECF 115], with no appeal so noted; or

2. If appeal is so noted, within 21 days after the issue of a mandate of the

1 United States Court of Appeals or dismissal of appeal and remand to this Court by the
2 United States Court of Appeals, or if *certiorari* is petitioned to the Supreme Court of the
3 States, the date of the denial of the petition of *certiorari*, or if the petition is granted, of the
4 final decision and any remand to this Court of the Supreme Court of the United States.

5
6 **IT IS SO STIPULATED:**

7
8 Dated this 13th day of January, 2022.

9 SCHWABE, WILLIAMSON & WYATT, P.C.

10
11 By: /s/ David R. Boyajian
David R. Boyajian, WSBA #50195
Email: dboyajian@schwabe.com
12 Noah Jarrett, WSBA #31117
Email: njarrett@schwabe.com
13 Adam P. Murray, WSBA #48553
Email: amurray@schwabe.com
14 Molly J Henry, WSBA #40818
Email: mhenry@schwabe.com
15 Christopher H. Howard, WSBA #11074
Email: choward@schwabe.com
16 *Attorneys for Vigor Marine, LLC*

17
18 Dated this 13th day of January, 2022.

19 GASPICH LAW OFFICE PLLC

20
21 By: /s/ Anthony J. Gaspich
Anthony J. Gaspich, WSBA #19300
22 Email: tony@gaspichwilliams.com
23 *Co-Counsel for Plaintiff Western Towboat*
24 *Company*

1 Dated this 13th day of January, 2022.

2 SIMMS SHOWERS LLP

3
4 By: /s/ J. Stephen Simms
5 J. Stephen Simms, *Pro Hac Vice*
6 Email: jssimms@simmsshowers.com
7 *Co-Counsel for Plaintiff Western*
8 *Towboat Company*
9

10 APPROVED AND SO ORDERED this 14th day of January, 2022.
11

12
13
14 

15 RICARDO S. MARTINEZ
16 CHIEF UNITED STATES DISTRICT JUDGE
17
18
19
20
21
22
23
24
25
26